

Audubon Magazine – Dicamba Press inquiry

EPA [[HYPERLINK "https://www.epa.gov/ingredients-used-pesticide-products/dicamba-2021-report-dicamba-incidents"](https://www.epa.gov/ingredients-used-pesticide-products/dicamba-2021-report-dicamba-incidents)] on dicamba incidents that the new restrictions that came with the re-registration of dicamba for over-the-top use were not effective in preventing off-target damage. Yet, there was no change to the label for the 2022 growing season. Sources I spoke with describe that lack of action for the 2022 season as the EPA dragging its feet or sitting on its hands. How does the agency respond to such criticisms?

Given the incident information obtained from the 2021 growing season, EPA is reviewing whether over-the-top dicamba can be used in a manner that does not pose unreasonable risks to non-target crops and other plants, or to federally listed species and their designated critical habitats.

As EPA carefully reviews dicamba-related incidents (see December 2021 report highlighted below), the Agency will continue to work with states and registrants to assess and implement additional restrictions. In early 2022, EPA approved amended labeling that included more restrictive labeling applicable in Iowa and Minnesota based on the registrants' request in partnership with the states' respective Departments of Agriculture. As stated on [[HYPERLINK "https://www.epa.gov/pesticides/epa-releases-summary-dicamba-related-incident-reports-2021-growing-season"](https://www.epa.gov/pesticides/epa-releases-summary-dicamba-related-incident-reports-2021-growing-season)], the other regulatory tools that the Agency could use to address the extent and severity of the alleged dicamba-related incidents were unlikely to be fully implemented in time due to the statutory processes that the Agency is required to follow.

In addition to EPA's evaluation of products allowing over-the-top applications of dicamba, all uses of dicamba are currently being assessed in [[HYPERLINK "https://www.epa.gov/pesticide-reevaluation/registration-review-process"](https://www.epa.gov/pesticide-reevaluation/registration-review-process)]. Registration review is a statutory program in which EPA reviews and updates older pesticide decisions based on today's more rigorous science standards. During this process, EPA will again consider both risks and benefits of current dicamba registrations to determine whether additional restrictions are necessary to ensure that all uses of dicamba products continue to meet the statutory standard of no unreasonable adverse effects.

Many sources tell me that dicamba is inherently volatile and there are no changes to the label that would prevent off-target damage—that the only way to prevent such damage is to cancel the registration of dicamba. Is it still EPA's position that the right restrictions can address dicamba's volatility and prevent off-target damage? Or does EPA intend to cancel the registration?

EPA is still reviewing whether over-the-top dicamba can be used in a manner that does not pose unreasonable risks to non-target crops and other plants, or to listed species and their designated critical habitats. The Agency is also coordinating with state regulators, weed scientists, and the appropriate registrants to collect any incident data for this past growing season to be used in future evaluations.

In particular, EPA has been in regular communication with the Association of American Pesticide Control Officials (AAPCO) and the Weed Science Society of America (WSSA). Each of these stakeholder groups plan to issue a dicamba survey this fall to better understand the dicamba situation from the perspective of state regulators and the academic/extension communities, respectively. EPA has been working with AAPCO and WSSA to develop survey questions that will be informative to EPA and feasible for survey respondents to answer.

If EPA determines that it is necessary to initiate cancellation of a registration for a pesticide, the following process is used: [[HYPERLINK "https://www.epa.gov/pesticide-tolerances/pesticide-cancellation-under-epas-own-initiative"](https://www.epa.gov/pesticide-tolerances/pesticide-cancellation-under-epas-own-initiative) \h].

EPA says it is "evaluating all of its options for addressing future dicamba-related incidents." Can you tell me when the agency will announce which option or options it plans to implement to address the problem?

EPA is collecting information on the 2022 season from various stakeholders including state regulators, academics, and registrants. Information from stakeholders will continue to be important to EPA's decisions moving forward. EPA is not able to offer you a timeline for any future decisions related to over-the-top dicamba at this time.

As part of the registration review process, EPA will soon release for public comment a second addendum to the 2016 draft human health risk assessment and a draft ecological risk assessment for dicamba. The draft risk assessments (DRAs) are part of the legally required registration review process to identify risks as well as actions that can mitigate those risks for all registered uses across all dicamba products. After reviewing and considering the public comments received on the DRAs, EPA will proceed with the next step in the FIFRA registration review process, which is the proposed interim registration review decision (PID), expected to be completed in 2023. The PID may include potential risk mitigation to address any potential risks of concern identified in the dicamba DRAs.

The EPA inspector general [[HYPERLINK "https://www.epa.gov/sites/default/files/2021-05/documents/_epaoig20210524-21-e-0146.pdf"](https://www.epa.gov/sites/default/files/2021-05/documents/_epaoig20210524-21-e-0146.pdf) \h] that, in extending the registration for over-the-top use of dicamba in 2018, the agency failed to conduct required internal peer review of the science behind that re-registration and that senior staff exerted undue influence over the process. What steps has EPA taken to ensure problems of that sort don't contaminate its future decisions about dicamba?

Under the Biden-Harris administration, EPA's Office of Chemical Safety and Pollution Prevention (OCSPP) has affirmed its commitment to transparency and scientific integrity as essential elements of the Agency's work. In a [[HYPERLINK "https://www.documentcloud.org/documents/20587958-epa-memorandum-scientific-integrity_23464"](https://www.documentcloud.org/documents/20587958-epa-memorandum-scientific-integrity_23464)] to OCSPP staff, Assistant Administrator Michal Freedhoff affirmed her own commitment to scientific integrity and acknowledged that political interference occurred with the 2018 dicamba decision despite the best efforts of EPA's career scientists and managers to recommend a different approach.

EPA is committed to implementing all recommendations and planned Agency corrective actions in OIG's report. For example, in line with OIG's third recommendation, OCSPP began conducting annual training for all staff and senior managers and policy makers to affirm the office's commitment to the Scientific Integrity Policy and principles and to promote a culture of scientific integrity. Additionally, OCSPP has agreed to implement a procedure requiring senior managers or policy makers to document changes or alterations to scientific opinions, analyses, and conclusions in interim and final pesticide registration decisions and their basis for such changes or alterations. OCSPP has also agreed to implement an

assistant administrator-level verification statement that Scientific Integrity Policy requirements were reviewed and adhered to during pesticide registration decisions that involve the immediate office.

As the Agency continues to review dicamba, it remains committed to making evidence-based decisions that rely on the input of career scientists and stakeholders.

EPA's dicamba incident report included data on dicamba usage for soybeans and cotton in 2020, but 2021 data weren't yet available at that time. Are the 2021 data available now, and can you point me toward that information? I'm looking for the best available data on overall acreage planted in dicamba-tolerant soybeans and cotton and, if possible, acreage treated with dicamba.

The 2021 data for over-the-top dicamba usage are not yet available. The most recent dicamba-tolerant acreage data is included in the [[HYPERLINK "https://www.regulations.gov/document/EPA-HQ-OPP-2020-0492-0021"](https://www.regulations.gov/document/EPA-HQ-OPP-2020-0492-0021) \h].